

10. The image generation device as described in claim 6, wherein said modulation textures consist of different patterns from said basic textures.

CHANGE OF CORRESPONDENCE INFORMATION

Applicant is submitting herewith a Change of Correspondence form. All future correspondence in this matter should be directed to Customer Number 026304 at **Katten Muchin Zavis Rosenman**, 575 Madison Avenue, New York, New York, 10022-2585, Phone: (212) 940-8800, Fax: (212) 940-8776. The attorney docket number has also changed to **SCEI 16.677 (100809-16047)**, and it is respectfully requested that the Examiner update such information in the PALM system.

REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-10 are rejected under 35 U.S.C. §102(e) as being anticipated by Rich (U.S. Patent 5,892,517). The Examiner indicates that the claim element of "executing by amplitude modulation mapping of modulation textures, amplitude modulation processing on patterns generated based on the mapping of said basic textures" is inherently disclosed in Rich. Reconsideration is respectfully requested in view of the following arguments.

Claim 1 of the present application recites the step of executing, by amplitude modulation mapping of modulation textures, amplitude modulation processing on patterns generated based on the mapping of said basic textures. In addition, claim 6 of the present application recites an image processing means that, by amplitude modulation mapping of modulation textures, executes amplitude modulation processing on the patterns generated based on mapping of the basic textures.

The basic textures are used to generate the overall pattern of a texture-mapped shape. Modulation textures are textures that are used for adding even higher-frequency components to basic textures. The pixel values that correspond to given vertices of the polygons are modulated by the modulation textures. Although a lowering of the image resolution was seen in ordinary texture mapping processing, the presently claimed

invention allows images that have the appropriate detail in a region near the viewpoint to be generated. The Examiner is respectfully directed to page 15 of the specification for a discussion of these points.

On the contrary, Rich only discloses scaling and quantizing amplitude of a texture mapping. Rich does not disclose or suggest amplitude modulation. Thus, Rich fails to teach or reasonably suggest the claimed invention.

Accordingly, Applicant respectfully disagrees with the Examiner that the originally-filed claims are taught by the cited art. The Manual For Patenting Examining Procedure (MPEP) § 2131 clearly sets forth the standard for rejecting a claim under 35 U.S.C. § 102(b). "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (MPEP § 2131, quoting Verdegaal Bros. v. Union Oil Co. of California 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). "The identical invention must be shown in as complete detail as is contained in the ...claim." (MPEP § 2131, quoting Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). "The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e. identity of terminology is not required." (MPEP § 2131, citing In re Bond, 15 USPQ2d 1566 (Fed. Cir. 1990)).

In this case, the cited art fails to teach the claimed invention as required by the MPEP for the reasons discussed above. Thus, it is respectfully submitted that the prior art fails to teach an image generation method for generating a two-dimensional image by texture mapping to three-dimensional polygons, comprising the steps of generating an overall pattern on said polygons by mapping of basic textures, and executing by amplitude modulation mapping of modulation textures, amplitude modulation processing on patterns generated based on the mapping of said basic textures, as claimed. It is also respectfully submitted that the prior art fails to teach an image generation device for generating a two-dimensional image by texture mapping to three-dimensional polygons, comprising a memory means that stores basic textures to be mapped to generate the overall pattern on a polygon, and modulation textures used to amplitude-modulate the patterns generated by mapping of the basic textures; and an image processing means that, by amplitude

modulation mapping of modulation textures, executes amplitude modulation processing on the patterns generated based on mapping of the basic textures, as claimed.

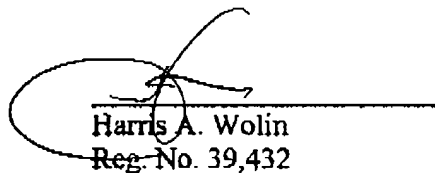
Accordingly, it is respectfully requested that the Examiner withdraw the rejection under 35 U.S.C. § 102(e).

For the foregoing reasons, reconsideration is respectfully requested.

An earnest effort has been made to be fully responsive to the Examiner's objections. In view of the above amendments and remarks, it is believed that originally-filed claims 1-10, consisting of independent claims 1 and 6 and the claims dependent therefrom, are in condition for allowance. Passage of this case to allowance is earnestly solicited. However, if for any reason the Examiner should consider this application not to be in condition for allowance, she is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged on Deposit Account 50-1290.

Respectfully submitted,



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